May 13, 2025

Patrick Lennberg
Division of Reclamation, Mining and Safety
Environmental Protection Specialist
1313 Sherman Street, Room 215
Denver, Colorado 80203

Via Email

Re: CEMEX Lyons Mine Permit M-1977-208
Technical Revision No. 12, Revised Groundwater Monitoring Plan
Second Quarter 2025 Monitoring Data

Dear Patrick Lennberg:

This letter transmits the surface water and groundwater data associated with the sampling of the cement kiln dust disposal area (C-Pit). This report includes data from the C-Pit ponded water and related groundwater monitoring for the second quarter of 2025, covering the reporting period from April 1, 2025, to June 30, 2025. Table 1 presents data for the last four quarters.

Groundwater samples were collected on April 15, 2025, from the CEM-001 and CEM-004 groundwater monitoring wells and from the C-Pit ponded water. The inspection of groundwater monitoring well CEM-005 on April 16, 2025, indicated that there was not enough water volume to collect a representative sample.

The samples collected from C-Pit ponded water and the groundwater monitoring wells were analyzed for pH, chloride, sulfate, total dissolved solids, selenium, and thallium. The reported pH data are based on the pH analyses performed at the time of sample collection in the field (Table 1). The measured pH at groundwater monitoring well CEM-004 and analytical results for chloride, sulfate, total dissolved solids (TDS), selenium and thallium from the April 15, 2025, groundwater sample were within the target levels prescribed by TR-12, as shown in Table 1.

In addition, a Stiff Diagram of the groundwater cation/anion data from CEM-004 compared to the average and 90th percentile of the cation/anion concentrations from the last four quarterly samples of C-Pit data is provided in Figure 1 for reference. As shown in Figure 1 and consistent with past reports, the signature for CEM-004 continues to be significantly different from that of C-Pit.

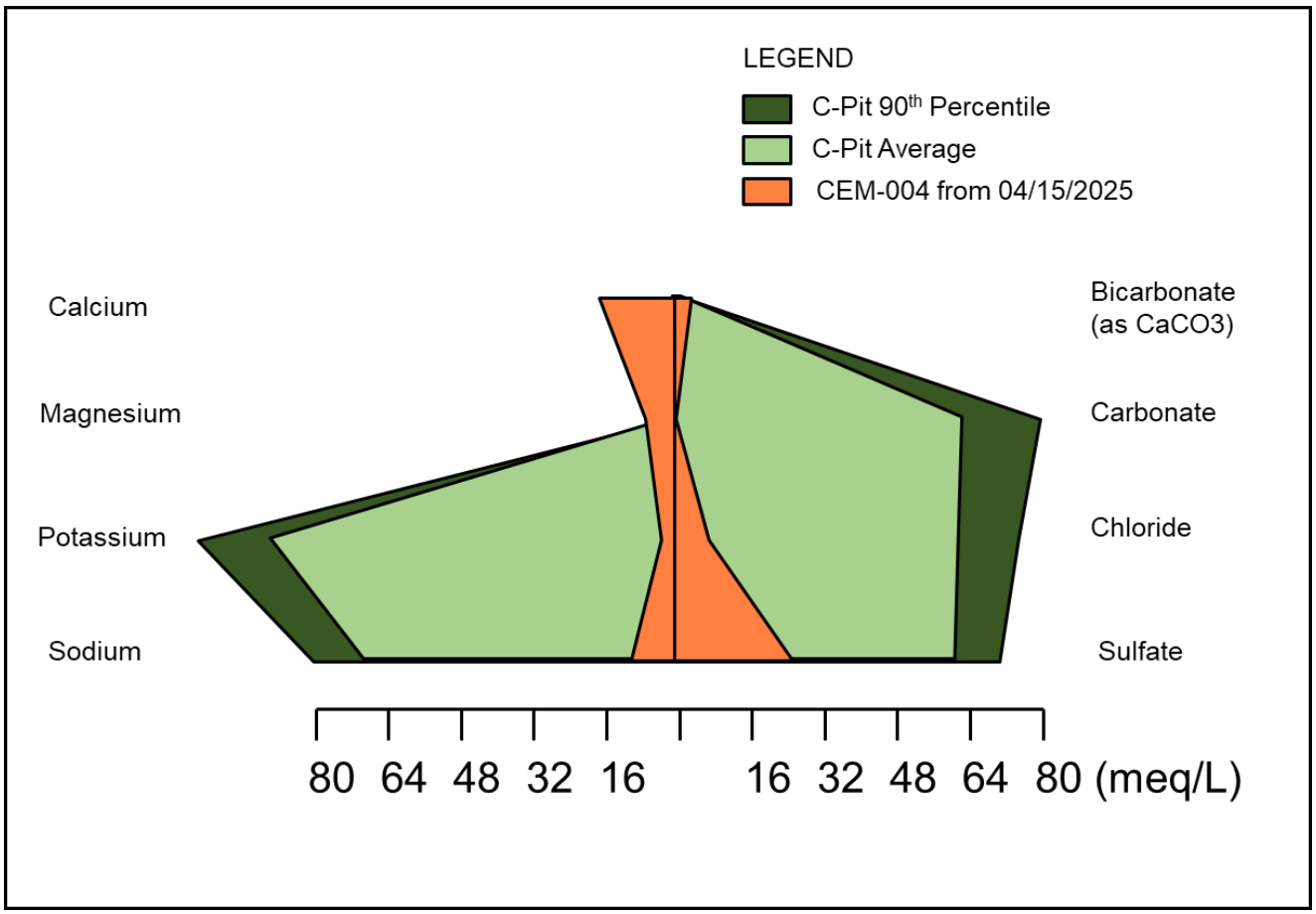


Figure 1: Second quarter 2025 cation/anion data for CEM-004 compared to C-Pit

Please contact me at 863-602-8024 or by email at robing.simons@cemex.com or any questions or concerns regarding this submittal.

Sincerely,

Robin Simons
Environmental Manager

Encs. Y25Q2C-Pit Monitoring Report and associated Stiff Plot (Fig.1), and Summary of Analytical Results (Table 1), Field Notes, and Time Trend Plots (Figs. A, B, C)

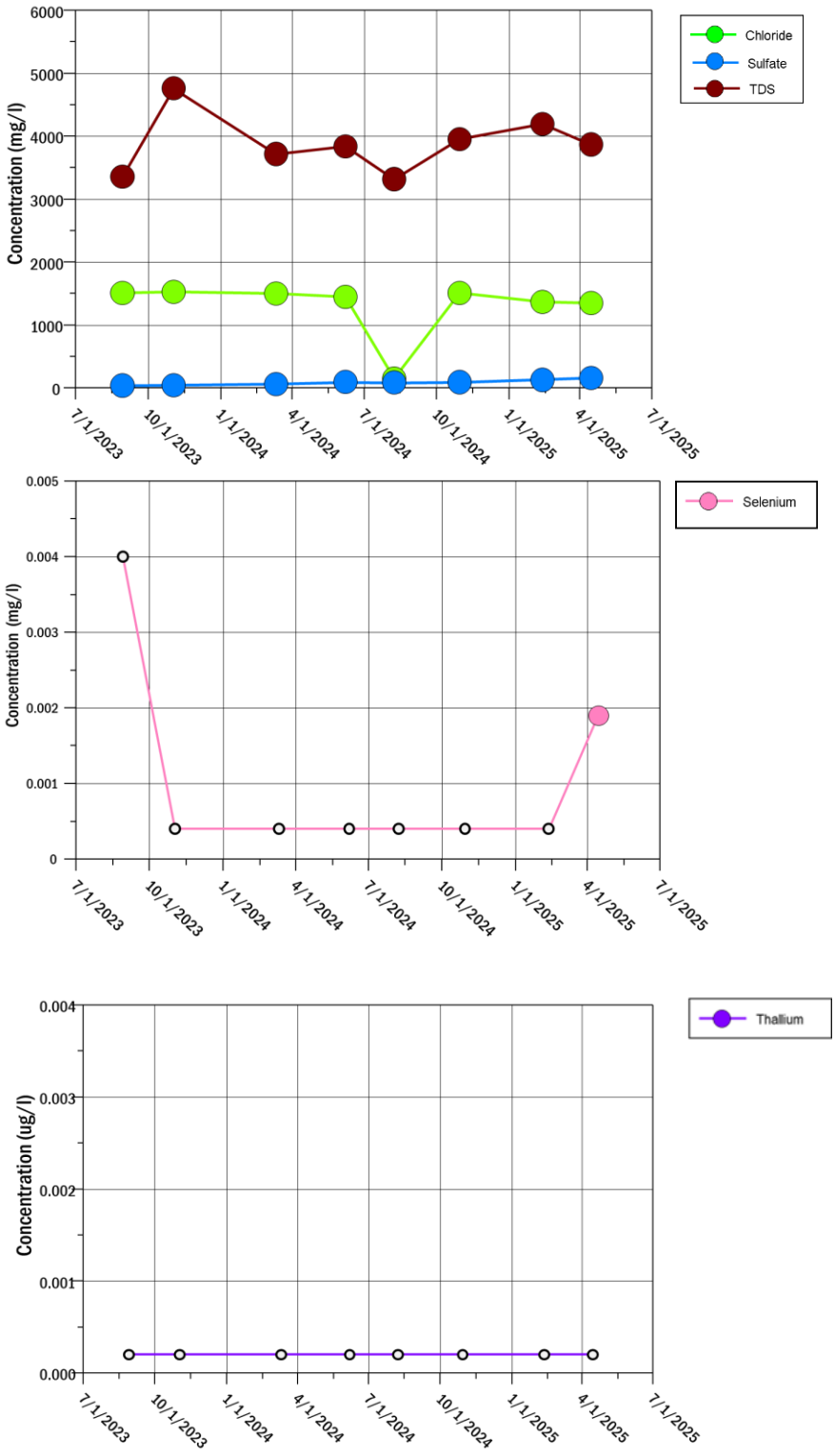
Table 1
Summary of Analytical Results

Parameter	Units	C-Pit				CEM-001				CEM-004				CEM-005				CEM-004, CEM-005 Triggers (TR-12)
		2024 Q3	2024 Q4	2025 Q1	2025 Q2	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2024 Q3	2024 Q4	2025 Q1	2025 Q2	2024 Q3	2024 Q4	2025 Q1	2025 Q2	
		8/8/2024	10/30/2024	2/11/2025	4/15/2025	8/8/2024	10/30/2024	2/11/2025	4/15/2025	8/8/2024	10/30/2024	2/12/2025	4/15/2025	[a] See dates below	[a] See dates below	[a] See dates below	[a] See dates below	
		value	value	value	value	value	value	value	value	value	value	value	value	value	value	value	value	
pH (On-site)	su	10.79	7.82	11.34	10.88	7.99	7.98	7.55	7.44	7.71	7.59	7.31	6.94	insufficient water to sample	insufficient water to sample	insufficient water to sample	insufficient water to sample	6.5-8.5
Chloride	mg/L	2420	2760	1930	1730	150	1510	1370	1350	3.4	120	181	261					1,053
Sulfate	mg/L	2870	3630	2620	2700	88.7	91.8	129	160	9.2	456	660	1240					2,641
Total Dissolved Solids	mg/L	11000	10200	8460	8430	3320	3960	4200	3870	83	976	1260	2250					501-10,000 or 1.25 times background
Dissolved Selenium	mg/L	0.533	0.575	0.362	0.361	<0.0004	<0.0004	<0.0004	0.002	<0.0004	0.0006	0.0009	0.0010					0.05
Dissolved Thallium	mg/L	0.0035	0.0037	0.0021	0.0018	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002					0.002

Notes and Qualifiers:

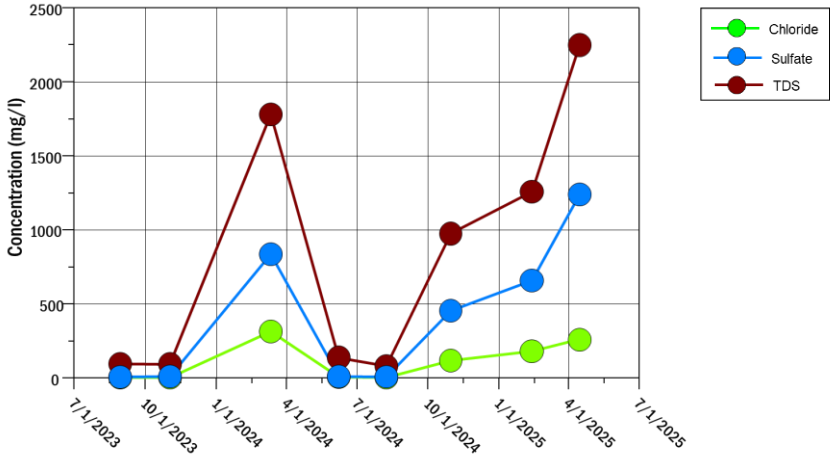
H	Sample analyzed beyond recommended hold time
U	Detection limit is estimated
UJ	Estimated low
X	Data may not be representative due to nonstandard field sampling protocol
NA	Not analyzed.
value	Exceeds trigger

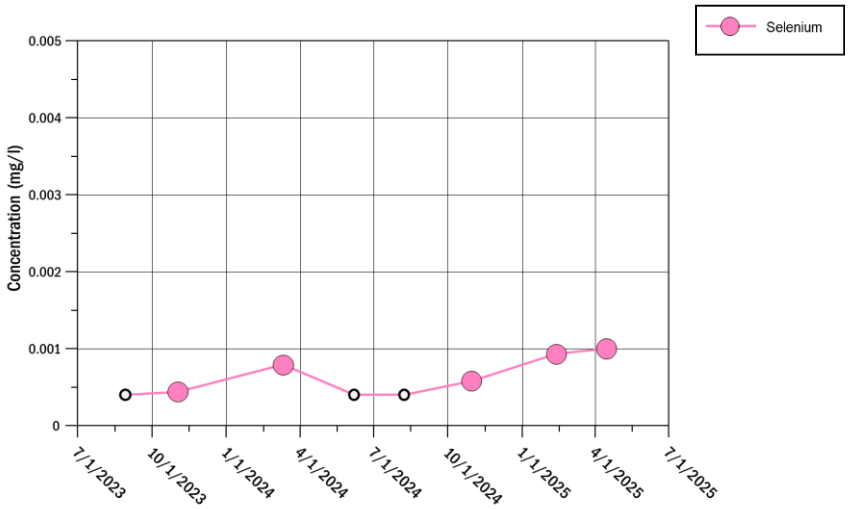
a CEM 005 Y24 Q3 Well Sounding: 8/9/2024
a CEM 005 Y24 Q4 Well Sounding: 10/31/2024
a CEM 005 Y25 Q1 Well Sounding: 02/12/2025
a CEM 005 Y25 Q2 Well Sounding: 04/16/2025

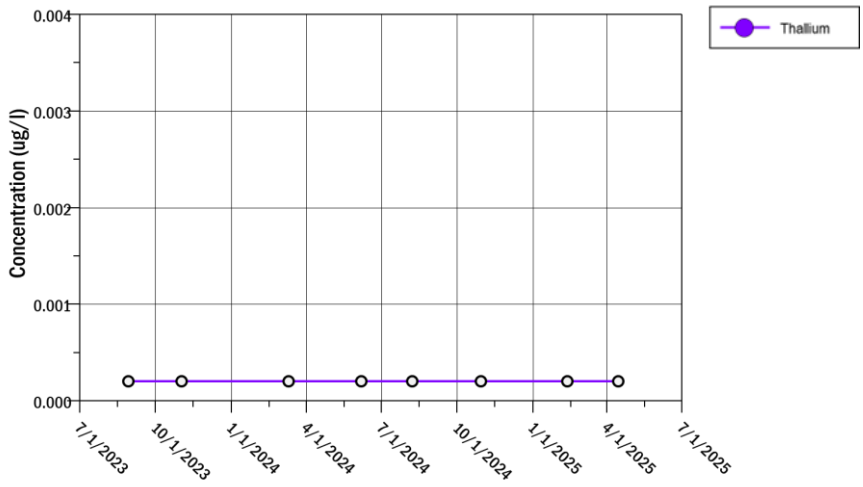


Note: Concentrations reported below the detection limit are plotted as open symbols

Figure A Time trend plots for CEM-001

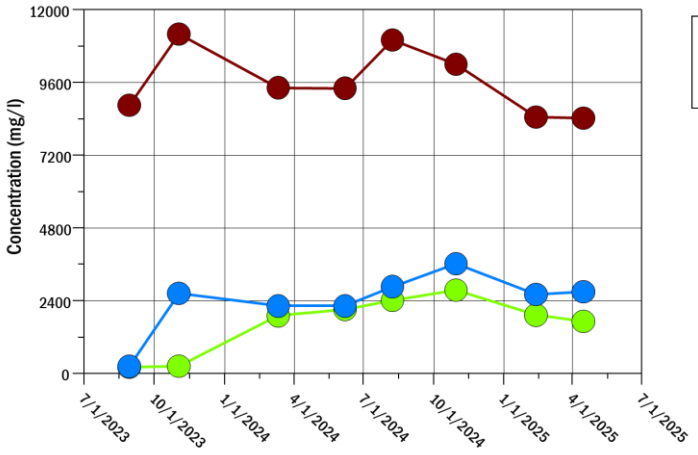


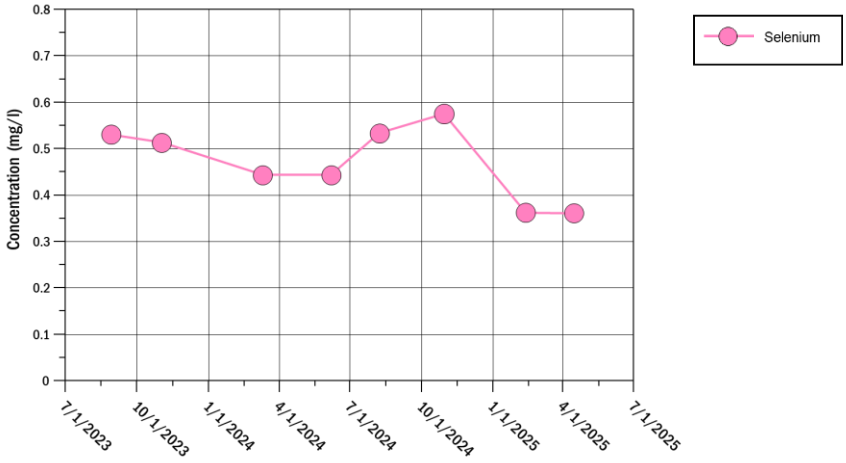


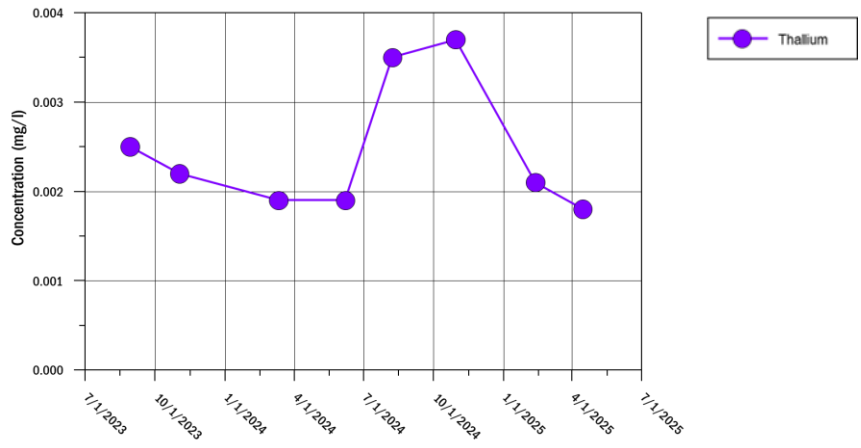


Note: Concentrations reported below the detection limit are plotted as open symbols

Figure B Time trend plots for CEM-004







Note: Concentrations reported below the detection limit are plotted as open symbols

Figure C Time trend plots for C-Pit

CEMEX Lyons Quarterly Groundwater Monitoring

Field Data Sheet

Date: 4/15/25 **Project Number:** 203125

Personnel: A. Johnston / S. Becker

Location	Date	Time	pH	Temp (°C)	Cond (mS/cm)	DO (mg/L)	Total Depth (fbtoc)	Depth to Water (ft)	Notes
CEM-001	4/15/25	13:00	7.82	15.4	558	2.05	143 (3.5' from top of casing to ground)	-	~~AB~~ 13:00 start purge
	4/15/25	13:35	7.99	14.9	5.17	2.32		-	13:15 purged dry
CEM-004	4/15/25	13:55	7.23	15.6	1.77	3.68	23.5		9.63' measured
	4/15/25	14:22	6.94	10.3	2.15	2.41			9.63' measured 1 gal purged
	4/15/25	14:52	6.90	11.3	2.48	3.10			9.63' measured 6 gal purged
	4/15/25	14:58	6.94	10.6	2.31	2.34			9.63' 7 gal purged
CEM-005	4/15/25	11:55	7.28	19.7	11.09	2.42	400 (2.62' from top of casing to ground)	396.65	399.27' measured 0.2 gal purged
	4/15/25	12:14	7.27	19.4	10.18	4.77		~~400.04~~ 397.42	400.04 measured 0.75 gal purged dry
	4/16/25	10:30						397.17	399.79 measured - not enough to sample after bail
A - Pit	4/15/25	12:35	8.23	16.7	1.56	6.47	N/A		
C - Pit	4/15/25	13:20	10.80	17.4	11.10	5.27	N/A		